

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 03CV12223RGS

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TERRI J. PEDATO, AS MOTHER AND \*

NEXT FRIEND OF RICHARD MORRILL \*

Plaintiff \*

\*

v. \*

\*

FRED H. ARRIGG, JR., M.D. \*

Defendant \*

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**JOINT PROPOSED DISCOVERY PLAN**

1. All interrogatories and requests for production of documents shall be served on or before January 15, 2007
2. All depositions (except *de bene esse* and expert depositions) shall be concluded on or before May 30, 2007; expert depositions are to be concluded on or before September 30, 2007.
3. Plaintiff's expert disclosure shall be made before June 30, 2007.
4. Defendants' expert disclosures shall be made on or before July 31, 2007.
5. Joinder of additional parties shall be sought on or before March 31, 2007.
6. Any motion pursuant to Fed. R. Civ. P. 56 shall be brought on or before October 31, 2007.
7. All oppositions to dispositive motions shall be filed by November 30, 2007.

Dated: December 20, 2006

The Plaintiff,  
By her attorney,  
Joseph G. Abromovitz, P.C.

s/Joseph G. Abromovitz

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Joseph G. Abromovitz  
858 Washington Street, 3<sup>rd</sup> Floor  
Dedham, MA 02026  
Phone: (781) 329-1080

The Defendant,  
By his attorney,  
Ficksman & Conley

s/Nicole M. Mason

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